

The Honorable Marsha J. Pechman

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SEATTLE

JULIE DALESSIO, an individual,

Plaintiff,

v.

UNIVERSITY OF WASHINGTON,

Defendant.

No. 2:17-cv-00642-RSM

DEFENDANT UNIVERSITY OF
WASHINGTON'S DISCLOSURE OF
PRIMARY WITNESSES

COMES NOW Defendant UNIVERSITY OF WASHINGTON pursuant to King County Local Rule 26(b) and the Order Setting Civil Case Schedule, and hereby identifies the following list of possibly primary witnesses from whom it may elicit testimony at trial. This disclosure is made based on limited discovery, and Defendant reserves the right to supplement this witness list, consistent with KCLR 26(c), as more information becomes available

A. LAY WITNESSES (INCLUDING THOSE WITH EXPERT TESTIMONY)

1. All witnesses listed by Plaintiff

Defendant UNIVERSITY OF WASHINGTON incorporates by reference the Primary Disclosure of Witnesses filed by Plaintiff in this case and reserves the right to call each witness listed in that disclosure.

- 1 **1.** Alison Swenson
2 c/o Keating, Bucklin & McCormack, Inc., P.S.
3 800 5th Avenue, Suite 4141
4 Seattle, WA 98104
5 206.623.8861

6 May testify regarding some or all of the public records requests
7 completed regarding Julie Dalessio.

- 8 **2.** Julie Dalessio
9 1110 29th Ave.
10 Seattle, WA 98122
11 (206) 324-2590

12 Ms. Dalessio is the plaintiff in this case and has knowledge of facts
13 regarding the allegations in her Complaint.

- 14 **3.** David Betz
15 1325 4th Avenue Suite 1400
16 Seattle, WA 98101-2573
17 (206) 457-4121

18 May testify regarding the facts and circumstances regarding his law
19 suit with Julie Dalessio and his 2015 public records request regarding Julie
20 Dalessio.

- 21 **4.** Perry Tapper
22 Public Records Compliance Officer
23 Office of Public Records and Open Public Meetings
24 c/o Keating, Bucklin & McCormack, Inc., P.S.
25 800 5th Avenue, Suite 4141
26 Seattle, WA 98104
27 206.623.8861

 May testify regarding the knowledge of the University of
Washington's Public Records Office operations, policies, and procedures
and facts and circumstances of this case.

- 1 **5.** Eliza Saunders
2 Director of the Office of Public Records
3 Office of Public Records and Open Public Meetings
4 c/o Keating, Bucklin & McCormack, Inc., P.S.
5 800 5th Avenue, Suite 4141
6 Seattle, WA 98104
7 206.623.8861

8 May testify regarding her knowledge of the University of
9 Washington's Public Records Office operations, policies, and procedures.

- 10 **6.** Barb Benson
11 Records Management Services
12 c/o Keating, Bucklin & McCormack, Inc., P.S.
13 800 5th Avenue, Suite 4141
14 Seattle, WA 98104
15 206.623.8861

16 May testify regarding records retention policies at the University of
17 Washington.

- 18 **7.** Milla Barbacar, Civil Rights Investigator
19 Washington State Human Rights Commission
20 711 South Capitol Way, Suite 402
21 P.O. Box 42490
22 Olympia, WA 98504-2490
23 (360) 359-4921

24 May testify regarding a complaint Plaintiff filed with the Human
25 Rights Commission in 2016.

- 26 **8.** Andrew Palmer
27 c/o Keating, Bucklin & McCormack, Inc., P.S.
 800 5th Avenue, Suite 4141
 Seattle, WA 98104
 206.623.8861

 May testify regarding the facts and circumstances of this case,
including assembling the response to PR 16.-00760.

B. EXPERT WITNESSES

Defendant has not currently retained any expert witnesses.

1 Discovery is ongoing. Defendant reserves the right to name additional lay or expert
2 witnesses whose identities may be disclosed through ongoing discovery in this case.
3 Defendant reserves the right to amend and supplement this list as necessary as discovery
4 continues. Defendant also reserves the right to call any and all witnesses identified by the
5 Plaintiff on any of his witness lists. Defendants reserve the right to solicit expert opinions
6 from the above-listed witnesses consistent with the rule of evidence and the individual
7 witness's skills, training, experience, and education.
8

9 DATED: October 26, 2017

KEATING, BUCKLIN & McCORMACK, INC., P.S.

11 By: /s/ Derek C. Chen

12 Derek C. Chen, WSBA #49723

13 Attorneys for Special Assistant Attorney General for
14 Defendant

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DECLARATION OF SERVICE

I declare under penalty of perjury under the laws of the State of Washington that on October 26, 2017, a true and correct copy of the foregoing DEFENDANT UNIVERSITY OF WASHINGTON'S DISCLOSURE OF PRIMARY WITNESSES was served upon the parties listed below via the method indicated:

Attorneys for Pro-Se Plaintiff

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Email: juliedalessio@msn.com

☒ E-mail ☒ United States Mail ☐ Legal Messenger

DATED this 26th day of October, 2017, at Seattle, Washington.

/s/ Derek C. Chen
Derek C. Chen